

Philip R. Weltin, Esq. SBN 46141
Brian E. Kerss, Esq. SBN 87522
Daniel R. Weltin, Esq. SBN 226600
Kevin P. McLaughlin, Esq. SBN 251477
WELTIN LAW OFFICE, P.C.
1432 Martin Luther King Jr. Way
Oakland, California 94612
Telephone (510) 251-6060
Facsimile (510) 251-6040

Attorneys for Plaintiffs
Rosa Galindo; Maria Galindo

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Rosa Galindo; Maria Galindo,
Plaintiffs,

v.

Financo Financial, Inc.; Patrick Patchin;
Ahmed Yama Asefi, Aaroon Sadat and
Nazia Nawabzada; Countrywide Bank,
N.A.; Countrywide Financial Corp.;
Homecomings Financial Network;
Commonwealth Land Title Company;
Joseph Esquivel, Pamela Spikes, and
Does 1-100,

Defendants.

Case No. 3:07-cv-3991 SC

**DECLARATION OF KEVIN P.
MCLAUGHLIN IN SUPPORT OF
PLAINTIFFS' MOTION TO RECOVER
REASONABLE EXPENSES OF MOTION
TO COMPEL FURTHER RESPONSES
TO DISCOVERY TO DEFENDANT
FINANCO FINANCIAL, INC.**

Date: September 5, 2008
Time: 10:00 a.m.
To be referred to Magistrate Judge

I, Kevin P. McLaughlin, hereby declare:

1. I am an attorney duly licensed to practice law in the State of California and am an attorney in the Weltin Law Office, P.C., attorneys of record for plaintiffs Rosa Galindo and Maria Galindo.


2. I have researched and drafted Plaintiffs' Motion to Compel Further Responses to Discovery to Defendant Financo Financial, Inc. The preparation of this motion, including the preparation of a separate statement of matters in dispute, declaration and memorandum has taken five hours. Additional time will be required if plaintiffs are forced to file a reply brief and argue this motion.

3. My services are billed at the reasonable rate of \$300 per hour. I have previously been awarded attorney's fees by the San Francisco Superior Court and Alameda County Superior Court at rates between \$200 and \$300 per hour. In contingency fee matters, I often earn in excess of \$300 per hour. Accordingly, our office seeks \$1,500 as the reasonable attorney's fees incurred in filing the underlying Motion to Compel Further Responses to Discovery to Defendant Financo Financial, Inc.

I declare under penalty of perjury the above is true and correct and that this declaration was executed in the County of Alameda.

Dated: July 29, 2008

WELTIN LAW OFFICE, P.C.


Kevin P. McLaughlin
Attorneys for Plaintiffs